

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Astral Industries, Inc.
502 East Sherman Street
and
7375 S. U.S. Highway 27
Lynn, IN 47355 - 0638**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T135-7722-00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal burial casket manufacturing plant.

Responsible Official: Charles B. Shaw, CEO
Source Address: Plant 1 at 502 East Sherman St., Lynn, IN and
Plant 2 at 7375 S. U.S. Hwy. 27, Lynn, IN
Mailing Address: P. O Box 638, Lynn, IN 47355-0638
Phone Number: 765 / 874 - 2525
SIC Code: 3995
County Location: Randolph
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(Units located at Plant 2 are so noted, all other units are located at Plant 1. Units may be moved between the two plants without prior notification to OAQ, IDEM, but notification shall be made upon such moves.)

- (a) a touch-up spray booth, equipped with air atomization spray applicators or equivalent, identified as U1, constructed prior to 1970, equipped with dry filters for PM overspray control, and exhausting through stack S1
- (b) a prime spray booth, equipped with both airless and HVLP airless spray applicators or equivalent, identified as U2, constructed prior to 1970, equipped with dry filters for PM overspray control, and exhausting through stack S2
- (c) a topcoat spray booth, equipped with airless spray applicators or equivalent, identified as U3, constructed in 1970, equipped with dry filters for PM overspray control, and exhausting through stack S3
- (d) a shading spray booth, equipped with air atomization spray applicators or equivalent, identified as U4, constructed in 1970, equipped with dry filters for PM overspray control and exhausting through stack S4
- (e) a colorcoat spray booth, equipped with air atomization spray applicators or equivalent, identified as U5, constructed in 1970, equipped with dry filters for PM overspray control and exhausting through stack S5
- (f) a stripper tank, identified as U6, constructed in 1989, and exhausting through stack S6
- (g) a sealer booth, equipped with air atomization spray applicators or equivalent, identified as U8, constructed in 1996, equipped with dry filters for PM overspray control and exhausting through stack S8

- (h) *at plant 2:* a casket assembly and powder coating operation, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with an average maximum throughput of 120 caskets per hour, consisting of the following emission units:
 - (1) a manual powder coat booth designated the Versa Coat Booth, with dry filters for PM overspray control
 - (2) two (2) automated powder coat booths designated Powder Coat Booths 1 and 2, with integral dry filters for PM overspray control
- (i) *at plant 2:* a natural gas fired boiler, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 15 million British thermal units per hour (MMBtu/hr), exhausting to stack S10

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21): *(Activities located at Plant 2 are so noted, all other activities are located at Plant 1)*

- (a) *at plants 1 & 2:* sanding and grinding operations with belt sanders and/or for welding touch-up, that have PM emissions below significant thresholds of 5 lbs/hr and 25 lbs/day [326 IAC 6-3-2]
- (b) a natural gas fired boiler rated at 0.2 MM Btu/hr, constructed following Sept. 21, 1983, [326 IAC 6-2-4]
- (c) two (2) natural gas fired boilers, constructed following Sept. 21, 1983, located in the office building, each rated at 1.5 MM Btu/hr [326 IAC 6-2-4]
- (d) *at plant 2:* a hook burn-off oven fired by natural gas, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to stack S14 [326 IAC 4-2-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form, or its equivalent, either by mail or facsimile, to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]19
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (A) A brief description of the change within the source;
- (B) The date on which the change will occur;
- (C) Any change in emissions; and
- (D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

The requirement from CP 135 - 5007 - 00002, issued on July 30, 1996, Operation Condition 6, that the particulate matter (PM) emissions from sanding and grinding operations shall not exceed the allowable emission rate of 4.6 pounds per hour, is not applicable because the allowable emission rate was based on a material processing weight of 2,378 lbs/hour. It has since been determined that maximum process weight for all units is less than 100 lb/hr.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2, 326 IAC 9-1-2, and this permit. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on Dec. 12, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(Units located at Plant 2 are so noted, all other units are located at Plant 1)

- (a) a touch-up spray booth, equipped with air atomization spray applicators or equivalent, identified as U1, constructed prior to 1970, equipped with dry filters for PM overspray control, and exhausting through stack S1
- (b) a prime spray booth, equipped with both airless and HVLP airless spray applicators or equivalent, identified as U2, constructed prior to 1970, equipped with dry filters for PM overspray control, and exhausting through stack S2
- (c) a topcoat spray booth, equipped with airless spray applicators or equivalent, identified as U3, constructed in 1970, equipped with dry filters for PM overspray control, and exhausting through stack S3
- (d) a shading spray booth, equipped with air atomization spray applicators or equivalent, identified as U4, constructed in 1970, equipped with dry filters for PM overspray control and exhausting through stack S4
- (e) a colorcoat spray booth, equipped with air atomization spray applicators or equivalent, identified as U5, constructed in 1970, equipped with dry filters for PM overspray control and exhausting through stack S5
- (f) a stripper tank, identified as U6, constructed in 1989, and exhausting through stack S6
- (g) a sealer booth, equipped with air atomization spray applicators or equivalent, identified as U8, constructed in 1996, equipped with dry filters for PM overspray control and exhausting through stack S8
- (h) *at plant 2:* a casket assembly and powder coating operation, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with an average maximum throughput of 120 caskets per hour, consisting of the following emission units:
 - (1) a manual powder coat booth designated the Versa Coat Booth, with dry filters for PM overspray control
 - (2) two (2) automated powder coat booths designated Powder Coat Booths 1 and 2, with integral dry filters for PM overspray control

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

- (a) Input VOC to sealer booth U8 shall be limited to less than 25 tons VOC per 12 consecutive month period. This input limit is required to limit PTE VOC to less than 25 tons per 12 consecutive month period, so that Best Available Control Technology (BACT) will not apply.
- (b) Stripper tank U6 is not subject to 326 IAC 8-1-6 (BACT) due to the PTE VOC < 25 tons/year. Should PTE VOC exceed 25 tons/year, BACT would apply. Any change or modification which may increase the PTE VOC emissions from tank U6 to 25 tons per year or more must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Units U1, U2, U3, U4, U5, U6, U8, and Versa Coat booth shall use no more than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. It is estimated that insignificant activities will emit less than 5 tons of VOC per 12 consecutive month period. This usage limit is required to limit the source potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
- (b) The requirement from CP 135 - 5007 - 00002 issued on July 30, 1996, requiring that VOC usage be limited to 249 tons per year, is not applicable because the limit does not distinguish significant emission units from insignificant activities. VOC usage shall be limited as described in D.1.2 (a).
- (c) Any change or modification from the equipment covered in this permit, which may increase potential emissions to 250 tons of VOC per year, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the coating and sealer booths U1, U2, U3, U4, U5, and U8 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The PM from the Powder Coat Booths 1 and 2 and the Versa Coat Booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D1.1 and D.1.2 and PM limits specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Conditions D.1.1(a) and D.1.2(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

D.1.8 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

D.1.9 Training Requirements

- (a) The Permittee shall implement an operator-training program.
- (1) All operators who perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Particulate Matter (PM)

Condition D.2.6 from Source Modification No. 135-11624-00002, issued on June 9, 2000, requiring daily filter inspections and weekly overspray observations, is not applicable because the permittee will be following Compliance Determination Requirements for an Operator Training Program for filters.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) and D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Monthly records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established for sealer booth U8 in Condition D.1.1(a) and for all emission units, combined, in Condition D.1.2(a).
- (1) The amount and VOC content of each coating material, coating solvent, and clean-up solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

- (2) A log of the dates of use;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with condition D.1.8 and D.1.9, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The requirement from A 135 - 9239 - 00002, issued on January 14, 1998, requiring that records to document compliance with PSD VOC limitations < 250 tons/year and BACT VOC limitations < 25 tons/year shall be kept for at least the past 36 month period, is not applicable because pursuant to 326 IAC 2-7-5(3), such records shall be kept for 5 years, and shall be kept at the source for a minimum of 3 years. Specific record keeping requirements are described in Condition C.17 (General Record Keeping Requirements) of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(Units/activities located at Plant 2 are so noted, all other units/activities are located at Plant 1)

- (a) *at plant 2:* a natural gas fired boiler, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 15 million British thermal units per hour (MM Btu/hr), exhausting to stack S10
- (b) an insignificant natural gas fired boiler, constructed following Sept. 21, 1983, rated at 0.2 MM Btu/hr [326 IAC 6-2-4]
- (c) two (2) insignificant natural gas fired boilers, constructed following Sept. 21, 1983, located in the office building, each rated at 1.5 MM Btu/hr [326 IAC 6-2-4]
- (d) *at plant 2:* an insignificant hook burn-off oven fired by natural gas, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 1.0 MM Btu/hr, exhausting to stack S14 [326 IAC 4-2-2]

The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the insignificant 0.2 MM Btu/hr and two 1.5 MM Btu/hr boilers used for indirect heating purposes and which were constructed after September 21, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the 15 MM Btu/hr boiler used for indirect heating purposes and which was constructed after September 21, 1983, shall in no case exceed 0.51 pounds of particulate matter per million British thermal units heat input.

D.2.2 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

Pursuant to Source Mod 135-11624-0002, issued June 19, 2000, the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the 15 MM Btu/hr boiler described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.2.3 Incineration [326 IAC 4-2-2]

- (a) Pursuant to 326 IAC 4-2-2 (Incinerators), all incinerators shall:
 - (1) consist of primary and secondary chambers or the equivalent;
 - (2) be equipped with a primary burner unless burning wood products;
 - (3) comply with 326 IAC 5-1 and 326 IAC IAC 2;
 - (4) be maintained properly as specified by the manufacturer and approved by the commissioner;

- (5) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (6) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (7) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty (50) percent excess air;
- (8) not create a nuisance or a fire hazard.

If any of the (1) - (8) above requirements are not met, the burning shall be terminated immediately.

- (b) All incineration shall comply with all other state and local laws and regulations.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test these emission units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 NSPS Record Keeping and Reporting [326 IAC 12-1][40 CFR Part 60.48c, Subpart Dc]

Pursuant to Source Mod. 135-11624-00002, issued June 9, 2000, the Permittee shall comply with the applicable record keeping and reporting provisions of New Source Performance Standard (NSPS) 40 CFR 60.48c, Subpart Dc, including:

- (a) Notification of the date of construction, anticipated startup, and actual startup of the 15 MM Btu/hr boiler shall be submitted by the Permittee as provided by § 60.7; and
- (b) The Permittee shall record and maintain records of the amounts of natural gas combusted in the 15 MM Btu/hr boiler during each month. (IDEM has reduced the daily fuel combustion records required by § 60.48c(g) to monthly records, based on U.S. EPA policy memo on the subject, dated February 20, 1992.)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Astral Industries, Inc
Source Address: 502 E. Sherman Street, and 7375 S. U.S. Hwy. 27, Lynn, IN
Mailing Address: P. O. Box 638 Lynn, IN 47355-0638
Part 70 Permit No.: T 135 - 7722 - 00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317 - 233 - 5674
Fax: 317 - 233 - 5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Astral Industries, Inc
Source Address: 502 E. Sherman Street, *and* 7375 S. U.S. Hwy. 27, Lynn, IN
Mailing Address: P. O. Box 638 Lynn, IN 47355-0638
Part 70 Permit No.: T 135 - 7722 - 00002

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Astral Industries, Inc.
Source Address: 502 E. Sherman Street and 7375 S. U.S. Hwy. 27, Lynn, IN
Mailing Address: P.O. Box 638 Lynn, IN 47355-0638
Part 70 Permit No.: T135 - 7722 - 00002
Facilities: U1, U2, U3, U4, U5, U6, U8, and Versa Coat booth
Parameter: VOC input
Limit: 245 tons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Astral Industries, Inc.
Source Address: 502 E. Sherman Street Lynn, IN
Mailing Address: P.O. Box 638 Lynn, IN 47355-0638
Part 70 Permit No.: T135 - 7722 - 00002
Facility: Sealer coating booth U8
Parameter: VOC input
Limit: < 25 tons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Astral Industries, Inc
Source Address: 502 E. Sherman Street, and 7375 S. U.S. Hwy. 27, Lynn, IN
Mailing Address: P. O. Box 638 Lynn, IN 47355-0638
Part 70 Permit No.: T 135 - 7722 - 00002

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Astral Industries, Inc.
Source Location: 502 E. Sherman St., and 7375 S. U.S. Hwy. 27, Lynn, IN 47355-0638
County: Randolph
SIC Code: 3995
Operation Permit No.: T 135-7722-00002
Permit Reviewer: B. J. Goldblatt

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Astral Industries, Inc., relating to the operation of a metal casket manufacturing plant.

Source Definition

This metal casket manufacturing company consists of two manufacturing facilities located in Indiana:

- (a) Plant 1 (manufacturing and liquid surface coating) is located at 502 East Sherman Street, Lynn, Indiana 47355
- (b) Plant 2 (stamping of metal caskets, parts assembly, and powder coating operations) is located at 7375 S. US 27, Lynn, IN 47355

Since these two plants are located on adjacent properties within 1/4 mile of each other, have the same SIC codes, and are owned by one company, and plant 1 provides a majority of its output to plant 2, they will be considered one source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:
(Units located at Plant 2 are so noted, all other units are located at Plant 1)

- (a) a touch-up air atomization spray booth, identified as U1, constructed prior to 1970, equipped with dry filters for overspray control, and exhausting through stack S1
- (b) a prime HVLP airless booth, identified as U2, constructed prior to 1970, equipped with dry filters for overspray control, and exhausting through stack S2
- (c) a topcoat airless spray booth, identified as U3, constructed in 1970, equipped with dry filters for overspray control, and exhausting through stack S3
- (d) a shading air atomization spray booth, identified as U4, constructed in 1970, equipped with dry filters for overspray control and exhausting through stack S4

- (e) a colorcoat air atomization spray booth, identified as U5, constructed in 1970, equipped with dry filters for overspray control and exhausting through stack S5
 - (f) a stripper tank, identified as U6, constructed in 1989, with no controls and exhausting through stack S6
- Note: CP 135-5007-00002, issued July 30, 1996, describes an open top degreaser emission unit. Source representatives have explained to OAM that the unit is not a degreaser, but rather is a stripper tank, identified in this proposed Part 70 permit as U6.
- (g) a sealer air atomization booth, identified as U8, constructed in 1996, equipped with dry filters for overspray control and exhausting through stack S8
 - (h) *at plant 2:* a casket assembly and powder coating operation, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with an average maximum throughput of 120 caskets per hour, consisting of the following emission units:
 - (1) a manual powder coat booth, identified as Versa Coat Booth, with dry filters for PM control
 - (2) two (2) automated powder coat booths, identified as Powder Coat Booths 1 and 2, with integral dry filters for PM control
 - (i) *at plant 2:* a natural gas fired boiler, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 15 million British thermal units per hour (MMBtu/hr), exhausting to stack S10

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):
(Activities located at Plant 2 are so noted, all other activities are located at Plant 1)

- (a) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) (10 MM) Btu per hour:
 - (1) a natural gas fired boiler rated at 0.2 MM Btu/hr, constructed following Sept. 21, 1983
 - (2) two (2) natural gas fired boilers, located in the office building, each rated at 1.5 MM Btu/hr, constructed following Sept. 21, 1983
 - (3) a natural gas fired air make-up unit rated at 2.0 MM Btu/hr
 - (4) a natural gas fired air make-up unit rated at 2.8 MM Btu/hr
 - (5) a natural gas fired reflow oven for paint booths, rated at 0.776 MM Btu/hr, and exhausting through stack S7.
 - (6) two (2) natural gas fired space heaters, each rated at 0.225 MM Btu/hr
 - (7) two (2) natural gas fired space heaters, each rated at 0.125 MM Btu/hr
 - (8) two (2) natural gas fired infrared radiant heaters, each rated at 0.12 MM Btu/hr

- (9) a natural gas fired infrared radiant heater rated at 0.04 MM Btu/hr
- (10) three (3) natural gas fired infrared radiant heaters, each rated at 0.06 MMBtu/hr
- (11) two (2) natural gas fired space heaters, each rated at 0.06 MM Btu/hr
- (12) four (4) natural gas fired space heaters with a total heat input rate of 0.525 MM Btu/hr
- (13) a natural gas fired space heater rated at 0.285 MM Btu/hr
- (14) a natural gas fired space heater rated at 0.175 MM Btu/hr
- (15) a natural gas fired glue pot rated at 0.2 MM Btu/hr
- (16) three (3) natural gas fired space heaters with a total heat input rate of 0.44 MM Btu/hr
- (17) three (3) natural gas fired infrared radiant heaters with a total heat input rate of 0.1 MM Btu/hr
- (18) *at plant 2:* eight (8) natural gas fired radiant heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr
- (19) *at plant 2:* twelve (12) natural gas fired radiant heaters, each with a maximum heat input capacity of 0.10 MMBtu/hr
- (20) *at plant 2:* a natural gas fired oven, designated the Dry-off Oven, with a maximum heat input capacity of 4.4 MMBtu/hr, exhausting to stack S3
- (21) *at plant 2:* a natural gas fired oven, designated the Quiet Oven, with a maximum heat input capacity of 8.8 MMBtu/hr, exhausting to stack S4
- (22) *at plant 2:* a natural gas fired oven, designated the Bake Oven, with a maximum heat input capacity of 5.6 MMBtu/hr, exhausting to stack S5
- (23) *at plant 2:* an air conditioner with an integral heating unit fired by natural gas which has a maximum heat input capacity of 0.56 MMBtu/hr, exhausting to stack S11
- (24) *at plant 2:* a humidifier fired by natural gas with a maximum heat input capacity of 0.476 MMBtu/hr, exhausting to stack S12
- (25) *at plant 2:* an evaporator unit fired by natural gas with a maximum heat input capacity of 0.1 MMBtu/hr, exhausting to stack S13
- (26) *at plant 2:* a hook burn-off oven fired by natural gas, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with a maximum heat input capacity of 1.0 MMBtu/hr, exhausting to stack S14
- (b) combustion source flame safety purging on startup
- (c) the following VOC and HAP storage containers: Vessels storing lubricating oils, hydraulic oil, machining oil, and machining fluids
- (d) cleaners and solvents characterized as follows:

- (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 deg F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 deg F);
- the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months
- (e) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment
 - (1) eleven (11) MIG welding stations using 0.03 L-50 RRB weld wire with a maximum wire consumption rate of 0.12 lb/hr each
 - (2) a TIG welding station with a maximum hourly metal consumption rate of 0.1 lb/hr
 - (3) *at plant 2:* four (4) metal inert gas (MIG) weld stations using a combined maximum of 30.1 pounds of wire per hour
 - (f) infrared cure equipment
 - (g) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs: a manual sponge-applied degreasing operation for wiping down caskets
 - (h) *at plants 1 & 2:* water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs: bed and interior assembly areas with adhesive and silk screening application
 - (i) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment
 - (j) paved and unpaved roads and parking lots with public access
 - (k) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - (l) gasoline emergency generators not exceeding 110 horsepower
 - (m) filter or coalescer media change-out
 - (n) *at plants 1 & 2:* a unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP: interior department silk screening areas with annual toluene emissions < 100 lbs/year

Activities with emissions equal to or less than thresholds:

- (o) a 1,000 gallon capacity thinner storage tank, constructed in the mid 1970's, with annual throughput > 12,000 gal./year and annual VOC emissions = 212 lb/year < 3 lbs/hr or 15 lb/day
- (p) *at plants 1 & 2:* sanding and grinding operations with belt sanders and/or for welding touch-up that have PM emissions < 5 lbs/hr and 25 lbs/day
- (q) interior department spray adhesives with VOC emissions < 3 lbs/hr or 15 lbs/day

- (r) interior department polyvinyl acetate resin emulsion with VOC emissions < 3 lbs/hr or 15 lbs/day
- (s) hardware department industrial adhesive with VOC emissions < 3 lbs/hr or 15 lbs/day

Notation: VOC emissions from the paint mix room, paint booth oven, sealer booth oven, and prime booth oven are attributed and recorded to their respective coating booths.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

CP 135 - 5007 - 00002 issued on July 30, 1996

A 135 - 9239 - 00002 issued on January 14, 1998

Source Modification No. 135-11624-00002 issued on June 9, 2000

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) A 135 - 9239 - 00002, issued on January 14, 1998

Condition 8: That records to document compliance with PSD VOC limitations < 250 tons/year and BACT VOC limitations < 25 tons/year shall be kept for at least the past 36 month period, will not be incorporated in this Part 70 permit.

Reason not incorporated: Pursuant to 326 IAC 2-7-5(3), such records shall be kept for 5 years, and shall be kept at the source for a minimum of 3 years. Specific record keeping requirements are described in Part 70 Permit Condition C.17 (General Record Keeping Requirements)

- (b) CP 135 - 5007 - 00002, issued on July 30, 1996

- (1) Operation Condition 3: That the total VOC usage for equipment shall be limited to 249 tons per year, will not be incorporated in this Part 70 permit.

Reason not incorporated: The 249 ton limit did not distinguish between significant emission units and insignificant activities. In this proposed Part 70 permit, VOC usage for significant emission units shall be limited to 245 tons per consecutive 12 month period, and insignificant units are estimated to emit less than 5 tons of VOC per consecutive 12 month period, so that PSD will not apply.

- (2) Operation Condition 6: That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from sanding and grinding operations shall not exceed the allowable emission rate of 4.6 pounds per hour, will not be incorporated in this Part 70 permit.

Reason not incorporated: The allowable emission rate was based on a material processing weight of 2,378 lbs/hour. It has since been determined that maximum processing weight for all units is less than 100 lbs/hour. This TSD for the proposed Part 70 permit includes corrected calculations for PTE PM for all sanding, grinding, and welding units at the source.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the dry filters on automated Powder Coat Booths 1 and 2 for particulate matter control be considered as an integral part of the automated powder coat booths because:

- (a) The controls are primarily utilized to recover powder that does not adhere to the parts in the coating booth. It is estimated that the dry filters will yield a recovery of almost forty percent (40%) of the powder sprayed.
- (b) The cost savings from the recovered powder is considerably greater than the cost of purchasing and maintaining the dry filters. Based on information submitted by Astral Industries, the annualized cost of the filters is \$8,400 per year, which is very small compared with the cost of the recovered powder coating which would total \$234,023 per year. The cost figures were based on projected actual operation.

IDEM, OAM has evaluated the justifications and agreed that the dry filters should be considered as an integral part of the automated powder coat booths. Therefore, pursuant to Source Mod. 135-11624-00002, issued June 9, 2000, the permitting level will be determined using the potential to emit after the dry filter controls for these two booths. Operating conditions in the proposed permit will specify that these dry filters shall be in place and maintained at all times the automated powder coat booths are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996. Additional information was received on February 4, 1997, November 22, 1999, November 24, 1999, December 8, 1999, June 5, 2000, and June 14, 2000.

Emission Calculations

See the Appendix of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
toluene	greater than 10
xylene	greater than 10
MEK	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.061
PM-10	0.781
SO ₂	0.004
VOC	134.479
CO	0.260
NO _x	0.611
HAP	unavailable

Potential to Emit After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Emission Unit	Potential to Emit (tons/year)					
	PM	PM-10	SO ₂	VOC	CO	NO _x
Sealer booth U8	-	-	-	< 25	-	-
Total Significant Units	123	123	-	245	15	18

"-" = not calculated, estimated minimal emissions

County Attainment Status

The source is located in Randolph County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Randolph County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Pursuant to Source Mod 135-11624-00002, issued June 9, 2000, the 15 million British thermal units per hour (MMBtu/hr) natural gas fired boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc) because construction will be after June 9, 1989 and it has a maximum design heat input capacity which is 100 MMBtu/hr or less, but greater than 10 MMBtu/hr. Pursuant to § 60.48c the following requirements are applicable:
- (1) the owner or operator shall submit notification of the date of construction, anticipated startup, and actual startup as provided by § 60.7; and
 - (2) the owner or operator shall record and maintain records of the amounts of natural gas combusted during each month. (IDEM has reduced the daily fuel combustion records required by § 60.48c(g) to monthly records, based on U.S. EPA policy memo on the subject, dated February 20, 1992.)

The insignificant natural gas fired boilers are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), due to their maximum design input heat capacity of less than 10 MM Btu/hour.

- (b) The insignificant thinner storage tank, constructed in the mid 1970's, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110 or 60.110a Subpart K or Ka) due to its capacity of less than 40,000 gallons.
- (c) The insignificant (item g) degreasing operation is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63), Subpart TT, due to it being a manually-applied, wipe cleaning operation, and due to the use of solutions containing less than 5 percent by weight of the specified halogenated HAP solvents.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on Dec. 12, 1996. The ERP has been verified to not fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans). The plan should identify the sources of air pollutants, and describe the approximate amount of reduction of the pollutants.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on Dec. 12, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (PSD)

The source, with PTE VOC > 250 tons/year, was constructed prior to August 7, 1977, and modifications were made to the source after August 7, 1980. The source has requested a facility-wide emission limit of < 250 tons of VOC per consecutive 12 month period. The proposed Part 70 Permit will limit VOC usage from significant emission units to 245 tons per 12 consecutive month period, with the estimation that insignificant activities will emit less than 5 tons of VOC per year. Therefore, 326 IAC 2-2, PSD requirements, will not apply.

326 IAC 2-4.1-1 (New source toxics control)

The source is a major source of HAP as defined in 326 IAC 2-4.1-1, due to its potential to emit a single HAP at a level greater than 10 tons/year and due to its potential to emit any combination of HAP at a level greater than 25 tons/year. However, since the source was constructed prior to July 27, 1997, 326 IAC 2-4.1-1 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Since the source has the potential to emit more than 100 tons per year of VOC, 326 IAC 8-6 could be applicable. However, the source was not constructed after October 7, 1974 and prior to January 1, 1980, so 326 IAC 8-6 does not apply.

State Rule Applicability - Individual Facilities

Incineration [326 IAC 4-2-2]

Pursuant to Source Mod. 135-11624-00002, issued June 9, 2000, the hook burn-off oven shall meet the following:

- (a) consist of primary and secondary chambers or the equivalent;
- (b) be equipped with a primary burner unless burning wood products;
- (c) comply with 326 IAC 5-1 and 326 IAC IAC 2;

- (d) be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (f) be operated so that emissions of hazardous material including, but limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (g) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty (50) percent excess air;
- (h) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating)

Particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} \quad \text{where: } Q = \text{total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.}$$

$$Pt = \text{Pounds of particulate matter emitted per million Btu heat input.}$$

The total Q for the source, prior to the construction of the 15 MM Btu/hr boiler, is 3.2 MM Btu/hr. Pursuant to 326 IAC 6-2-4, Pt for Q less than 10 MM Btu/hr shall not exceed 0.6. Particulate emissions from the insignificant 0.2 MM Btu/hr boiler and two 1.5 MM Btu/hr boilers are limited to 0.6 pounds per MM Btu heat input. Based on estimations, the insignificant boilers can comply with the rule.

The total Q for the source, upon construction of the 15 MM Btu/hr boiler, and including all indirect heating facilities at the Plant 1 and Stamping Plant locations, is 18.2 MMBtu/hr. Pursuant to Source Mod. 135-11624-0002 issued June 9, 2000, particulate emissions from the 15MM Btu/hr boiler are limited by the above equation to 0.51 pounds per MMBtu heat input.

Based on calculations from the Technical Support Document (TSD) for Source Mod. 135-11624-0002, issued June 9, 2000, the boiler can comply with the rule.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the surface coating booths, sealer booth, and powder booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the coating booths are in operation, in order to comply with this limit.

- (b) The particulate matter emissions rate from the insignificant grinding, sanding, and welding activities, which have a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

The PTE PM from the insignificant sanding, grinding, and welding activities can be calculated as follows, as determined in the TSD for Source Mod.135-11624-00002, issued June 9, 2000, and extrapolated for all units:

Welding: 0.17 lbs PM/hr for 120 caskets at Plant 2
 0.04 lbs PM/hr for 30 caskets at Plant 1

Sanding/Grinding : 0.08 lbs PM/hr for 120 caskets at Plant 2
 0.02 lbs PM/hr for 30 caskets at Plant 1

Total: 0.31 lbs PM/hr or 1.36 tons PM/year

The PTE (PM) from the welding, sanding and grinding activities is calculated as 0.31 pounds per hour, which is less than 0.551 pounds per hour, so the operations can comply with the rule.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

- (a) Sealer booth U8, constructed after January 1, 1980, with PTE > 25 tons VOC/year, shall be limited to < 25 tons input VOC /12 consecutive month period, so that Best Available Control Technology (BACT) will not apply.
- (b) Stripper booth U6, constructed after January 1, 1980, is not subject to BACT, due to PTE VOC < 25 tons/year.

As documented in the Technical Support Document for CP 135-5007-00002, issued July 30, 1996:

PTE VOC from U6 =

4.2 gal. coating # 1/day * 365 days/year * 8.5 lb VOC / gal. of coating * 1 ton/2000 lb = 6.52 tons VOC/year
0.17 gal.coating # 2/day * 365 days/year * 8.59 lb VOC/gal. of coating * 1 ton/2000 lb = 0.27 tons VOC/year

Total PTE VOC from U6 = 6.79 tons VOC / year

Should VOC input to U6 reach or exceed 25 tons per 12 consecutive month period, the source shall submit and receive approval of a BACT plan, pursuant to 326 IAC 8-1-6, before such input may occur.

- (c) No other facility at the source is subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) due to construction prior to January 1, 1980.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

None of the facilities at the source are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating), because the facilities coat burial caskets (SIC code 3995) and are not located in or adjacent to a county designated as nonattainment for ozone.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

All of the degreasing operations conducted at the source use water-based cleaning solutions containing no VOC. Therefore, 326 IAC 8-3 is not applicable to any facility at the source.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Coating booths U1, U2, U3, U4, U5, and U8 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 5-1-2 (Opacity Limitations).

- (b) Pursuant to Source Mod 135-11624-00002, issued June 9, 2000, Powder Coat Booths 1 and 2 and the Versa Coat Booth have applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the coating booth exhausts while the observed booths are in operation. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission, is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (2) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this casket production plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T135 - 7722 - 00002**.

Appendix

Potential to Emit VOC and PM from Surface Coating

Based on Maximum Production Potential of 30 Caskets/hour
and Worst Case Coatings for a Casket at the Source

Potential to Emit VOC from Sealer Booth U8

Based on Maximum Production Potential of 7 Caskets/hour
and Worst Case Coating for a Casket in Sealer Booth U8

Source Potential to Emit, prior to non-integral controls or limits

Based on Maximum Production, Worst Case formulas, 8760 hours/year

Insert Spreadsheet here

Source Potential to Emit, prior to non-integral controls or limits

Maximum Production, Worst Case formulas, 8760 hours/year

(units = tons/year)

Emission Units and Insignificant Activities	Reference TSD	PM	PM-10	SO ₂	NO _x	VOC	CO
Total Spray Surface Coating U1, U2, U3, U4, U5	T135-7722-00002	83.9	83.9	-	-	544.10	-
Sealer U8	T135-7722-00002	3.81	3.81	-	-	56.16	-
Stripper U6	T135-7722-00002	-	-	-	-	6.79	-
Versa Coat	S. Mod.135-11624-00032	32.4	32.4	-	-	-	-
Total Powder Coat 1 & 2	S. Mod.135-11624-00032	0.40	0.40	-	-	-	-
Total grinding,sanding,welding	T135-7722-00002	1.36	1.36	-	-	-	-
Total combustion	S. Mod.135-11624-00032	0.3	1.2	0	15.7	1.0	0.7
	CP 135-5007-00002	0.2	0.2	0	1.6	0.1	13.2
	T135-7722-00002*	0.02	0.1	0	1.3	0.08	1.1
Total		122.39	123.37	-	18.6	608.23	15.0

" - " = not calculated, estimated minimal emissions

* includes only the two insignificant 1.5 MM Btu/hr boilers

Total VOC emissions from insignificant activities, which includes the insignificant combustion activities in the above table, have been estimated to be < 5 tons/yr.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Astral Industries, Inc.
 Source Location: 7375 S. U.S. Highway 27 and 502 E. Sherman St.
 Lynn, IN 47355-0638
 County: Randolph
 SIC Code: 3995
 Operation Permit No.: T 135 - 7722 - 00002
 Permit Reviewer: B. J. Goldblatt

On July 18, 2000, the Office of Air Management (OAM) arranged for a notice to be published in the News-Gazette, Winchester, Indiana, stating that Astral Industries, Inc., had applied for a Part 70 Operating Permit to operate a metal casket manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The Office of Air Management (OAM) was recently given the new name of Office of Air Quality (OAQ). Name changes will not be noted with BOLD and "line through" formatting in this Addendum, but the issued permit will reflect such changes.

The OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been adjusted to reflect the revisions.

1. Condition B.1 has been deleted.

~~B.1 — Permit No Defense [IC 13]~~

~~(a) — Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) — This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

2. The deletion of Condition B.1 has resulted in a numbering shift , i.e. B.x-1, to the remaining B Conditions.
3. The following change has been made to Condition B.11(c)(3):

~~B.11~~ B.10(c)(3) Whether compliance was ~~based on~~ continuous or intermittent data;

4. The following change has been made to Condition B.13(b)(5):

~~B.13~~ B.12(b)(5) (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent notice**, either ~~in writing by mail~~ or facsimile, ~~of the emergency to:~~

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

5. The following changes have been made to Condition B.14:

~~B.14~~ B.13 Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~; IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

6. The following changes have been made to Condition B.16:

~~B.16~~ B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

3. Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

- ~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~
- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

7. The Emergency/Deviation Report and Compliance Monitoring Report have been altered to incorporate Condition B.15 changes, which are described in above Revision #6.

8. The following changes have been made to Condition B.19

~~B.19~~ B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~

9. The following changes have been made to Condition B.24:

- ~~B.24~~ **B.23** Transfer of Ownership or Operational Control [326 IAC 2-7-11]
-
- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- The application which shall be submitted by the Permittee ~~does not~~ requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

10. The following changes have been made to Condition C.18, which has been re-numbered due to Response #8:

- ~~C.18~~ **C.17** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
-
- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached Semi-Annual Quarterly Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from the permit requirements, ~~and, the date(s) of each deviation, the cause of the deviation, and the response steps taken~~ must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.
11. The following changes have been made to Condition D.1.11, which was re-numbered due to changes discussed in Response #8, and Quarterly Report Forms have been changed to reflect the need for certification.

~~D.1.11~~ **D.1.12 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

On August 15, 2000, Astral Industries, Inc. submitted comments on the proposed Part 70 permit. A summary of the comments follows:

Comment #1:

In Section A.1, 502 E. Sherman St. should be identified as Plant 1, and 7375 U. U.S. Hwy. 27 should be identified as Plant 2.

Response #1:

The following changes have been made to Section A.1:

11. A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
The Permittee owns and operates a stationary metal burial casket manufacturing plant.

Responsible Official: Charles B. Shaw, CEO
Source Address: **Plant 1 at** 502 East Sherman St., Lynn, IN *and*
Plant 2 at 7375 S. U.S. Hwy. 27, Lynn, IN

Comment #2:

Sections A.2, Emission Units and Pollution Control Equipment Summary, and D, Facility Description, should be changed, as shown, to allow for operational flexibility without increased emissions, avoiding unnecessary notifications of IDEM; or to more accurately identify a unit; or to maintain constancy of wording.

Response #2:

The following changes have been made to Sections A.2 and D. While Astral suggested that filter purpose for (h) be changed from "PM" to "overspray", OAQ has decided to describe the purpose for all spray unit filters as "PM overspray":

- (a) a touch-up ~~air atomization~~ spray booth, **equipped with air atomization spray applicators or equivalent**, identified as U1, constructed prior to 1970, equipped with dry filters for **PM overspray** control, and exhausting through stack S1
- (b) a prime HVLP ~~airless~~ spray booth, **equipped with both airless and HVLP airless spray applicators or equivalent**, identified as U2, constructed prior to 1970, equipped with dry filters for **PM overspray** control, and exhausting through stack S2
- (c) a topcoat ~~airless~~ spray booth, **equipped with airless spray applicators or equivalent**, identified as U3, constructed in 1970, equipped with dry filters for **PM overspray** control, and exhausting through stack S3
- (d) a shading ~~air atomization~~ spray booth, **equipped with air atomization spray applicators or equivalent**, identified as U4, constructed in 1970, equipped with dry filters for **PM overspray** control and exhausting through stack S4
- (e) a colorcoat ~~air atomization~~ spray booth, **equipped with air atomization spray applicators or equivalent**, identified as U5, constructed in 1970, equipped with dry filters for **PM overspray** control and exhausting through stack S5
- (f) a stripper tank, identified as U6, constructed in 1989, ~~with no controls~~ and exhausting through stack S6
- (g) a sealer ~~air atomization~~ booth, **equipped with air atomization spray applicators or equivalent**, identified as U8, constructed in 1996, equipped with dry filters for **PM overspray** control and exhausting through stack S8
- (h) *at plant 2:* a casket assembly and powder coating operation, constructed within 18 months of the issuance of Source Mod. 135-11624-00002, issued June 9, 2000, with an average maximum throughput of 120 caskets per hour, consisting of the following emission units:
 - (A) (1) a manual powder coat booth designated the Versa Coat Booth, with dry filters for **PM overspray** control
 - (B) (2) two (2) automated powder coat booths designated Powder Coat Booths 1 and 2, with integral dry filters for **PM overspray** control

Comment #3

IDEM has identified emission units and pollution control equipment in Sections A and D of the draft permit by location in either Plant 1 or Plant 2. Astral requests that the following sentences be added as conditions to Sections A.2, D.1, and D.2:

"Except as otherwise noted in this permit, emission units and pollution control equipment included in this permit may be moved between Plant 1 and 2 without prior notification. If a physical change or change in the method of operation involving any relocated emission unit or pollution control equipment occurs, the Permittee may need to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2."

Response #3

The following change has been made to condition A.2:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:
(Units located at Plant 2 are so noted, all other units are located at Plant 1. **Units may be moved between the two plants without prior notification to OAQ, IDEM, but notification shall be made upon such moves**)

Comment #4

In section C.4, Astral requests that wording be changed slightly to reflect additional terms listed later in the permit. Suggested wording is "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in this permit, in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable."

Response #4

The following change has been made to condition C.4:

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2, ~~and~~ 326 IAC 9-1-2, **and this permit**. 326 IAC 9-1-2 is not federally enforceable.

Comment #5

In Section C.10, Astral requests that compliance monitoring for new emission units or emission units added through a source modification be implemented when normal operation begins, thereby allowing for a period of shakeout following construction completion.

Response #5

Emission controls are required to be operational during shakeout periods following construction completion. Compliance monitoring during shake-out can help to show the effectiveness of the controls when the units and controls are being fine-tuned for operation. Compliance Response Plans may describe that response steps are not necessary during periods of shake-out following construction completion. No changes will be made in the permit in response to Comment #5.

Comment #6

In Section D.1.2(a), the Powder Coating Booths should be included with respect to PSD applicability. Also, other activities, including future activities and those not previously identified as insignificant, should be considered for the "insignificant" allowance of up to 5 tons of VOC per 12 consecutive month period. Therefore, Astral suggests the following wording in the first two sentences in Section D.1.2(a); "Units U1, U2, U3, U4, U5, U6, U8, Powder Coating Booths 1 & 2, and the Versa Coat Booth shall use no more than 245 tons of VOC, including VOC from coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. It is estimated that other activities, including insignificant activities, will emit less than 5 tons of VOC per 12 consecutive month period."

Response #6

Correspondence with Bob Warner 10/20 and 10/27, explaining the situation below and providing an opportunity for Astral to increase the estimation of VOC emissions from insignificant activities, resulted in no change in Astral's estimation of VOC emissions from insignificant activities.

Existing activities which have not previously been identified as insignificant but are considered to be insignificant are included in the 5 tons of VOC estimation, and do not need to be identified in this Part 70 permit unless they are specifically regulated by applicable rules. Conditions included in this Part 70 permit are applicable for current activities and might not be applicable for future activities. If future insignificant activities should emit VOCs in an amount that would, in combination with current insignificant activities, reach or exceed 5 tons of VOC per year, a permitting revision would be required to appropriately estimate VOC emissions from new and existing insignificant activities and limit emission units to a value that would make PSD not applicable.

The Powder Coating Booths were described in Source Modification No. 135-11624-00002, issued on June 9, 2000, as having the PTE no VOCs. The change from non-VOC powder to VOC containing powder would require review under 326 IAC 2-7 before such a modification could be made to the process, unless the PTE VOC from the modification would be less than 10 tons per year (based on the source not being required to use air pollution control equipment to comply with applicable provisions of 326 IAC 8). The provisions of 326 IAC 2-7-10.5 (Part 70 permits; source modifications), 326 IAC 2-7-11 (Administrative permit amendments) and 326 IAC 2-7-12 (Permit Modification) outline the application requirements for making these types of changes. With the issuance of this permit, VOC emissions from all insignificant activities, including VOC emissions from the Powder Coating Booths, are estimated to be less than 5 tons/year.

The following change has been made to Condition D.1.2:

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

-
- (a) Units U1, U2, U3, U4, U5, U6, U8, and Versa Coat booth shall use no more than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. It is estimated that insignificant activities will emit less than 5 tons of VOC per 12 consecutive month period. This usage limit is required to limit the source potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.
 - (b) The requirement from CP 135 - 5007 - 00002 issued on July 30, 1996, requiring that VOC usage be limited to 249 tons per year, is not applicable because the limit does not distinguish significant emission units from insignificant activities. VOC usage shall be limited as described in D.1.2 (a).

- (c) Any change or modification from the equipment covered in this permit, which may increase potential emissions to 250 tons of VOC per year, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.**

Comment #7

In Section D.1.7, compliance should be with Conditions D.1.1(a) and D.1.2(a).

Response #7

The following changes have been made to Condition D.1.7:

D.1.7 VOC Emissions

Compliance with Conditions D.1.1 **(a)** and D.1.2 **(a)** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

Comment #8

Section D.1.9(b) reads, "Monthly inspections shall be performed of the coating emissions from stacks S1, S2, S3, S4, S5, and S8, and the presence of overspray on the rooftops and the nearby ground." Such frequent inspection and associated record keeping seems unnecessarily burdensome considering that Astral has had no prior history of particulate emission problems from the surface coating operations. Therefore it is proposed that the requirement be relaxed after several consecutive months of observations reveals no presence of overspray. Suggested language: "Monthly inspections shall be performed of the coating emissions from stacks S1, S2, S3, S4, S5, and S8 and the presence of overspray on the rooftops and the nearby ground. If after three consecutive months no overspray is observed on rooftops or nearby ground, inspections can become quarterly. If, however, subsequent observations reveal the presence of overspray on the rooftops or nearby ground, inspections will revert back to monthly."

Response #8

During a 17 October 2000 telephone conversation, Bob Warner from Astral responded to the Permit Reviewer's 13 October e-mail message, stating that he would like to use an alternate compliance monitoring method which requires operator training for filter maintenance as a Compliance Determination condition. Because Astral has a good compliance history, alternate Compliance Determination conditions would be appropriate for the source.

Therefore, the Compliance Monitoring Condition D.2.6 in Source Modification No. 135-11624-00002, issued on June 9, 2000, will not be included in the Part 70 Permit.

Condition D.2.6: That daily inspections of filters and weekly observations of overspray shall be performed to monitor filter function and performance for Powder Coat Booths 1 and 2 and the Versa Coat Booth

Reason not incorporated: The source representative has requested that Compliance Determination Requirements for an Operator Training Program for filters be substituted for Compliance Monitoring Conditions.

Additionally, Condition C.14 - Compliance Monitoring Plan, Failure to Take Response Steps - has been removed because a CMP is not necessary for the Operator Training Program. The remaining C conditions have been renumbered, i.e. C.x-1. The following changes were made to Conditions D.1.8, D.1.9, and D.1.10 (b) in the Part 70 Permit: (D.1.11 below also includes changes discussed in Response # 10)

~~C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]~~

- ~~(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- ~~(5) A Compliance Response Plan (GRP) for each compliance monitoring condition of this permit. GRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The GRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on-site, and is comprised of:~~
- ~~(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
- ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.~~
- ~~(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or~~
- ~~(3) An automatic measurement was taken when the process was not operating; or~~

- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- ~~(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~
 - ~~(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.~~
 - ~~(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Compliance Determination Requirements

D.1.8 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

D.1.9 Training Requirements

(a) The Permittee shall implement an operator-training program.

- (1) All operators who perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

~~The dry filters for PM control shall be in operation at all times when coating booths U1, U2, U3, U4, U5, U8, Powder Coat Booths 1 and 2, and the Versa Coat Booth are in operation.~~

D.1.9 Monitoring

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface and sealer coating booth stacks S1, S2, S3, S4, S5, and S8, while the observed booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from stacks S1, S2, S3, S4, S5, and S8, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(3) Pursuant to Source Mod. 135-11624-00002, issued June 9, 2000, daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for Powder Coat Booths 1 and 2 and the Versa Coat Booth. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the coating booth exhausts while the observed booths are in operation. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission, is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.10 Particulate Matter (PM)

Condition D.2.6 from Source Modification No. 135-11624-00002, issued on June 9, 2000, requiring daily filter inspections and weekly overspray observations, is not applicable because the permittee will be following Compliance Determination Requirements for an Operator Training Program for filters.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.1.10~~ D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) and D.1.2(a), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established for sealer booth U8 in Condition D.1.1(a) and for all emission units, combined, in Condition D.1.2(a).
- (1) The amount and VOC content of each coating material, coating solvent, and clean-up solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The total VOC usage for each month;
 - (4) The weight of VOCs emitted for each compliance period.

- (b) ~~To document compliance with Condition D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

To document compliance with condition D.1.8 and D.1.9, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The requirement from A 135 - 9239 - 00002, issued on January 14, 1998, requiring that records to document compliance with PSD VOC limitations < 250 tons/year and BACT VOC limitations < 25 tons/year shall be kept for at least the past 36 month period, is not applicable because pursuant to 326 IAC 2-7-5(3), such records shall be kept for 5 years, and shall be kept at the source for a minimum of 3 years. Specific record keeping requirements are described in Condition C.17 (General Record Keeping Requirements) of this permit.

Comment #9

In Section D.1.10, compliance should be documented in conditions D.1.1(a) and D.1.2(a).

Response #9

Changes due to Comment #9 were made as indicated in Response #10.

Comment #10

In Sections D.1.10(a)(1) and D.1.10(a)(3), the requirement to maintain solvent usage records differentiating those added to coatings and those used as cleanup solvents is irrelevant to Astral. Previous record keeping requirements did not contain this requirement. The only required record keeping should be that required to prove compliance with the proposed 245 tpy VOC emissions limit. These differentiation requirements should be deleted.

Response #10

It is important for permittees to realize that clean-up solvent usage is included in VOC usage limits that make PSD and BACT not applicable. While it is not necessary to record whether a solvent is used for coatings or clean-up, it is necessary to record all coating solvent and clean-up solvent usage. Due to Comments #10 and #11, the following changes have been made to Condition D.1.10(a), which was changed to D.1.11(a) as indicated in Response # 8:

~~D.1.10~~ D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 (a) and D.1.2 (a), the Permittee shall maintain records in accordance with (1) through ~~(6)~~ (4) below. **Monthly** records maintained for (1) through ~~(6)~~ (4) ~~shall be taken monthly and~~ shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established **for sealer booth U8** in Condition D.1.1 (a) and **for all of the emission units, combined, in Condition D.1.2 (a).**
- (1) The amount and VOC content of each coating material, **coating solvent**, and **clean-up** solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) A log of the dates of use;
- ~~(3) The cleanup solvent usage for each month;~~
- ~~(4)~~ (3) The total VOC usage for each month; **and**
- ~~(5) Input VOC to sealer coating booth U8, and~~
- ~~(6)~~ (4) The weight of VOCs emitted for each compliance period.

Comment #11

In Section D.1.10(a)(2), the requirement to log dates of use is irrelevant. The only current emission limit imposed on Astral should be that of 245 tpy for VOC, and previous record keeping requirements did not contain this logging of use requirement. This logging also appears to be redundant with the conditions for recordkeeping included in Section D.1.10(a)(1).

Response #11

Astral has a 245 tons VOC/12 consecutive month limit for all combined emission units and a 25 tons VOC/12 consecutive month limit for unit U8. Record keeping provides evidence that a source is staying within its limits. Keeping a log of the dates of VOC usage can provide better evidence of compliance than keeping only monthly totals of VOC usage. However, the permittee has the discretion to log usage daily, weekly, monthly, or in another dated manner which s/he thinks is appropriate for the operation and so that compliance can be documented. D.10(a)(1) does not address dates, while D.10(a)(2) addresses dates, so there does not appear to be redundancy. Changes which have been made to the permit as a result of Comment #11 are shown in Response #10.

Comment #12

In Section D.1.10(b), compliance should be documented for conditions D.1.3 and D.1.9.

Response #12

Section D.1.10(b) has been changed as a result of Comment #8.

Comment #13

Astral requests that the wording in Section D.2.3 be reworded to avoid possible confusion of what actions should result in the termination of burning in the hook burn-off oven. Astral also requests that a more definitive determination of compliance methodology be specifically included in the permit with regards to the particulate matter emission limits included in 326 IAC 4-2-2. Suggested rewording of D.2.3:

- (a) "Pursuant to Source Mod 135-11624-00002, issued June 9, 2000, the hook burn-off oven shall consist of primary and secondary chamber or the equivalent, and be equipped with a primary burner unless burning wood products. The hook burn-off oven shall:
 - 1. comply with 326 IAC 5-1 and 326 IAC 2;
 - 2. be maintained properly as specified by the manufacturer and approved by the commissioner;
 - 3. comply with other state and/or local rules or ordinances regarding installation and operation of incinerators, as applicable.
- (b) Provided that D.2.3(a)(1) through (3) are met, and the hook burn-off oven is not modified in any way such that it is no longer an insignificant unit, the hook burn-off oven can be expected to:
 - 1. be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
 - 2. result in less than 0.5 pounds of particulate matter per 1,000 pounds of dry exhaust gas at standard conditions corrected to 50 percent excess;
 - 3. not create a nuisance or a fire hazard.

Response #13

The following changes have been made to D.2.3:

D.2.3 Incineration [326 IAC 4-2-2]

- (a) **Pursuant to 326 IAC 4-2-2 (Incinerators), all incinerators shall:** ~~Pursuant to Source Mod. 135-11624-00002, issued June 9, 2000, the hook burn-off oven shall meet the following:~~
 - (a) (1) consist of primary and secondary chambers or the equivalent;
 - (b) (2) be equipped with a primary burner unless burning wood products;
 - (c) (3) comply with 326 IAC 5-1 and 326 IAC IAC 2;
 - (d) (4) be maintained properly as specified by the manufacturer and approved by the commissioner;
 - (e) (5) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
 - (f) (6) be operated so that emissions of hazardous material including, but **not** limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(g) (7) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty (50) percent excess air;

(h) (8) not create a nuisance or a fire hazard.

If any of the (1) - (8) above **requirements result are not met**, the burning shall be terminated immediately.

(b) All incineration shall comply with all other state and local laws and regulations.

Comment #14

The last paragraph under the source definition on the first page of the Technical Support Document needs some modification. First, the paragraph states that these two plants are on adjacent properties. The properties owned by Astral are actually separated by a US Highway and by two properties not owned by Astral. The properties are within a 1/4 mile of each other. Presently, plant 2 provides a majority of its output to plant 1. When the powder coating system becomes fully operational, only about half of the output will be sent to plant 1.

Response #14

OAQ, IDEM, has interpreted adjacent properties as those falling within a reasonable distance of each other and contiguous properties as those which share a border. Since the properties have been identified as adjacent, function with the same SIC code, and operate under common ownership, they will be considered one major source for purposes of 326 IAC 2-7, pursuant 326 IAC 2-7-1(22). No changes have been made in the permit as a result of Comment #14.

**Appendix A: Emissions Calculations
VOC and Particulate**

**Company Name: Astral
Address City IN Zip: Lynn, IN
OP: T135-7722
Plt ID: 00002
Reviewer: B.J.Goldblatt
Date: June 2000**

Worst Case Casket Surface Coating

Emission Unit and Coating	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Coating (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
U2 P-5015 prime _{bottom}	8.7	61.66%	0.0%	61.7%	0.0%	23.76%	0.01675	30	5.39	5.39	2.71	65.06	11.87	3.69	22.70	50%
U2 P-5085 prime _{top&sides}	10.1	58.80%	48.3%	10.5%	58.4%	27.40%	0.06700	30	2.55	1.06	2.13	51.20	9.34	18.28	3.87	50%
U5 P-5028 colorcoat	7.1	92.97%	0.0%	93.0%	0.0%	5.07%	0.32275	30	6.60	6.60	63.89	1533.26	279.82	15.87	130.14	25%
U4 P-5028 shade	7.1	92.97%	0.0%	93.0%	0.0%	5.07%	0.01200	30	6.60	6.60	2.38	57.01	10.40	0.59	130.14	25%
U3 P-5012 top	7.6	78.88%	0.0%	78.9%	0.0%	16.68%	0.28475	30	5.99	5.99	51.14	1227.32	223.99	44.97	35.90	25%
U1 P-5028 touchup	7.1	92.97%	0.0%	93.0%	0.0%	5.07%	0.01000	30	6.60	6.60	1.98	47.51	8.67	0.49	130.14	25%

Total Surface Coating PTE

124.22 2981.36 544.10 83.90

Worst Case Casket at **Sealer Booth U8**

Antique Copper	7.3	88.06%	0.0%	88.1%	0.0%	7.18%	0.50000	4	6.41	6.41	12.82	307.72	56.16	3.81	89.29	50%
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PTE VOC from stripper tank U6 is calculated in TSD text to be 6.79 tons/year

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Coating (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Coating (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) *(Weight % organics) / (Volume % solids)

Total = Sum of all solvents used

one unit = one casket